

Debtor.

4. The parties will exchange and provide to the Court declarations containing the direct testimony of all witnesses no later than 5:00 pm ET on August 28, 2023.

5. The parties will submit a proposed pre-trial order to the Court no later than 5:00 pm ET on August 28, 2023. The proposed pre-trial order will cover, among other things, the relevant matters set forth in this stipulation and order, as well as the applicable remote hearing procedures set forth at *In re KB US Holdings, Inc.*, No. 20-22962 (SHL), Dkt. No. 176 (Sept. 18, 2020).

6. The parties will exchange and provide to the Court binders with copies of witness lists (excluding rebuttal witnesses), declarations, exhibits, and stipulations entered into by the parties no later than 5:00 pm ET on August 28, 2023.

7. In the event that Debtor prevails on the Phase One aspect of the proceedings, the Court shall schedule additional evidentiary hearings on the balance of the Lift Stay Motion.

Dated: New York, New York  
August 17, 2023

GOLDBERG WEPRIN FINKEL GOLDSTEIN PAUL HASTINGS LLP  
LLP

By: /s/ Kevin J. Nash  
Kevin J. Nash

By: /s/ Harvey A. Strickon  
Harvey A. Strickon

Proposed Attorneys for the Debtor

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The following stipulation is hereby  
SO ORDERED this \_\_\_ day of  
August 2023

\_\_\_\_\_  
Hon. Philip Bentley